



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

March 17, 2025

By ECF

Hon. Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Khalil v. Joyce*, 25-cv-1935 (JMF)

Dear Judge Furman:

This Office represents the government in this case. We write respectfully, with the consent of Petitioner's counsel, to request that the Court grant the government leave *nunc pro tunc* to file an oversized reply brief in further support of its motion to dismiss or transfer. Your Honor's individual rules set the limitations for such briefs at 3,500 words, and the government's reply brief is approximately 900 words over that limit (at 4,395 words). We apologize for exceeding the Court's word limit, and for this belated request.

We thank the Court for its consideration of this request.

Respectfully submitted,

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cc: Counsel of Record (by ECF)